

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BOOKENDS & BEGINNINGS LLC, on
behalf of itself and all others similarly
situated,

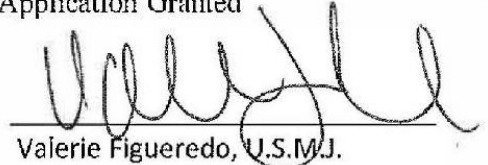
Plaintiff,

v.

AMAZON.COM, INC.; HACHETTE
BOOK GROUP, INC; HARPERCOLLINS
PUBLISHERS L.L.C.; MACMILLAN
PUBLISHING GROUP, LLC; PENGUIN
RANDOM HOUSE LLC; SIMON &
SCHUSTER, INC.,

Defendants.

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: 4/27/2022

Parties to provide a joint status letter by
5/25/22.

Case Number 1:21-cv-02584-GHW-DCF

PARTIES' STIPULATED DISCOVERY SCHEDULE

I. INTRODUCTION

As instructed by the Honorable Magistrate Judge Debra C. Freeman on April 15, 2022 (ECF No. 123), the parties have engaged in good faith discussions and jointly propose the following discovery schedule without prejudice to the pursuit of, or objection to, additional discovery by any party.

II. STIPULATED DISCOVERY SCHEDULE

| Timing | Event |
|--------------------------------|--|
| No later than May 15, 2022: | Parties to produce a one-month sample of data in satisfaction of discovery requests. |
| Ten months after MTD Decision: | Deadline to file Class Certification motion. |

| Timing | Event |
|-------------------------------------|--|
| Twelve months after MTD Decision: | Deadline to file opposition to Class Certification motion. |
| Thirteen months after MTD Decision: | Deadline to file reply in support of Class Certification motion. |
| Fifteen months after MTD Decision: | Close of fact discovery (including all depositions). |
| Sixteen months after MTD Decision: | Deadline for Plaintiff to file Expert Reports. |
| Eighteen months after MTD Decision: | Deadline for Defendants to file Expert Reports. |
| Nineteen months after MTD Decision: | Close of Expert discovery (including all depositions). |

Dated: April 22, 2022
New York, New York

Respectfully submitted,

/s/ Joel Mitnick

Joel Mitnick
Zachary P. Schrieber
CADWALADER, WICKERSHAM & TAFT LLP
200 Liberty Street
New York, NY 10281
Telephone: (212) 504-6555
Facsimile: (212) 504-6666
joel.mitnick@cwt.com

Attorneys for Defendant Macmillan Publishing Group, LLC.

/s/ John E. Schmidtlein

John E. Schmidtlein
Jonathan B. Pitt (#JP0621)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, D.C. 20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
jschmidtlein@wc.com
jpitt@wc.com

Attorneys for Defendant Amazon.com, Inc.

/s/ C. Scott Lent

C. Scott Lent
ARNOLD & PORTER KAYE SCHOLER LLP
250 W. 55th Street
New York, NY 10019
Telephone: (212) 836-8220
Facsimile: (212) 836-8689
scott.lent@arnoldporter.com

Attorney for Defendant HarperCollins Publishers LLC

/s/ Rich Snyder

Rich Snyder
FRESHFIELDS BRUCKHAUS DERINGER US LLP
700 13th Street, NW
10th Floor
Washington, DC 20005-3960
Telephone: (202) 777-4565
Facsimile: (202) 507-5965
richard.snyder@freshfields.com

Attorneys for Defendant Hachette Book Group, Inc.

/s/ Jennifer B. Patterson

Jennifer B. Patterson
Saul P. Morgenstern
ARNOLD & PORTER KAYE SCHOLER LLP
250 W. 55th Street
New York, NY 10019
Telephone: (212) 836-7210
Facsimile: (212) 836-8689
saul.morgenstern@arnoldporter.com
margaret.rogers@arnoldporter.com

Attorney for Defendant Penguin Random House LLC

/s/ Yehudah L. Buchweitz

Yehudah L. Buchweitz
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153
Telephone: (212) 310-8256
Facsimile: (212) 310-8007
yehudah.buchweitz@weil.com

Jeff L. White
2001 M Street, NW
Washington , DC 20036
Telephone: (202) 682-7059
Facsimile: (202) 857-0940
jeff.white@weil.com

Attorneys for Defendant Simon & Schuster, Inc.

/s/ Steve W. Berman

Steve W. Berman
Barbara A. Mahoney
HAGENS BERMAN SOBOL SHAPIRO LLP
1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: 206-623-7292
Facsimile: 206-623-0594
steve@hbsslaw.com
barbaram@hbsslaw.com

Counsel for Plaintiff and the proposed class

cc: All Counsel of Record (via ECF)

SO ORDERED.

Dated: 04/27/2022
New York, New York



VALERIE FIGUEREDO, U.S. Magistrate Judge